

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

UNITED STATES OF AMERICA

PLAINTIFF

VS.

NO.: 3:16-CV-489-CWR-JCG

HINDS COUNTY, MISSISSIPPI, *et al.*

DEFENDANT

**DECLARATION OF GARY CHAMBLEE**

Pursuant to 28 U.S.C. § 1746, I, Gary Chamblee, state as follows:

1. I am over twenty-one (21) years of age and have personal knowledge of the information provided herein.

2. I serve as Vice President for Benchmark Construction.

3. Benchmark Construction ("Benchmark") and CDFL Architects and Engineers are assisting Hinds County, Mississippi ("the County") in making renovations to the Raymond Detention Center ("RDC"). Benchmark is providing construction management and quality control services to the County, overseeing the work done by the County's vendors as they perform various renovations at the RDC.

4. Benchmark has overseen the completion of renovations to each of the four living units on B Pod, including preparing these living units for direct supervision. Vendors are now moving to make additional renovations to the viewing windows on cell doors throughout the living units on C Pod. The County's vendors previously completed numerous renovations to C Pod, but, when detainees were put back into the living units on C Pod, they damaged the renovated living units once again.

5. With respect to fire safety at the facility, Benchmark can verify that vendor has completed the reinstallation of fire hoses throughout all three pods (A, B, and C) such that each pod now has fire hose system. Fire alarm cabling also have been installed throughout each of the

four living units in B Pod, and Benchmark is now overseeing the County's vendor install fire alarm devices in each of the four living units within C Pod.

6. Benchmark also can verify the installation of detention-grade light fixtures in the cells in B Pod. These detention-grade light fixtures are intended to help prevent detainees from destroying light fixtures and gaining access to the lighting system's wiring to create sparks.

7. With respect to the doors and locking mechanisms at the RDC, Benchmark has overseen the refurbishment of all doors at the following points, with correct locking mechanisms being installed and each door being converted to a swing door: all doors going from the facility's Great Hall into the three pods, all doors leading into the living units on all pods, all recreation doors, and all cage doors. The County's vendors have replaced all sliding doors in living units B-3 and B-4 with swinging doors and reinforced the cell doors in units C-1, C-2, C-3, and C-4. The County's vendors also have replaced the control panel for the electronic door locks on B pod, C pod, and central control. Based on what I have seen, the swing doors being installed have held up much better to detainees' efforts to defeat the locking mechanisms on those doors.

8. With respect to cells which were welded shut but filled with trash by detainees, these cells were welded shut but not completely sealed, and detainees were able to throw trash into the cells through the space beneath the welded doors and through broken cell-door windows. The County had these cells opened and cleaned out. Some of the cells were able to be repaired and put back on-line, but others were not repaired and were welded shut once again. For these cells that were welded back shut, we had metal plates added to the bottom of the cell doors and welded a plate over the cell door windows to prevent detainees from filling these off-line cells back up with trash and creating new trash cells.

9. With respect to facility maintenance, in addition to County maintenance workers, there are vendors onsite helping addressing facility maintenance issues.

10. I declare under the penalties of perjury that the foregoing information is true and correct to the best of my knowledge.

EXECUTED on this the 14th day of December, 2021.

*Gary Chamblee*

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Gary Chamblee